



THE CITY OF NEW YORK  
**LAW DEPARTMENT**

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September 1, 2022

**Via CM/ECF**

Honorable John P. Cronan  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 1320  
New York, New York 10007

Re: *Johnny Muniz v. City of New York and New York City Police Department*  
*Deputy Inspector John Mastronardi*  
Civil Action No. 1:20-CV-09223-JPC  
Law Department No. 2020-046956

Dear Judge Cronan:

I am an Assistant Corporation Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing Defendants, the City of New York and New York City Police Department Inspector John Mastronardi (collectively, “Defendants”), in the above-referenced case. In accord with Your Honor’s Individual Rules of Practice, I write to respectfully request that the deadline for Defendants to file their motion for summary judgment be extended by two weeks, from September 6, 2022, to September 20, 2022; that Plaintiff Muniz be given until October 11, 2022, to file his response to the motion for summary judgment; and that Defendants be given until November 7, 2022, to file their reply in support thereof. Plaintiff consents to the requested extension. This is Defendants’ first request for an extension of this deadline.

The extension is being sought because of workload issues, including a high volume of other employment-related matters in federal and state court. Consequently, I request two additional weeks in which to prepare an appropriate motion for summary judgment, which will also need to be internally reviewed before it can be filed. The parties are not currently scheduled to appear before the Court, and the requested extension would not affect any other scheduled dates in this litigation.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/

Zachary T. Ellis

Assistant Corporation Counsel

cc: All Counsel of Record via CM/ECF

The Court grants this request. Defendants will file their motion for summary judgment by September 20, 2022. Plaintiff will file his response by October 11, 2022. Defendants will file their reply by November 7, 2022. The Clerk of Court is respectfully directed to close the motion pending at Docket Number 49.

SO ORDERED.

Date: September 2, 2022

New York, New York



JOHN P. CRONAN

United States District Judge